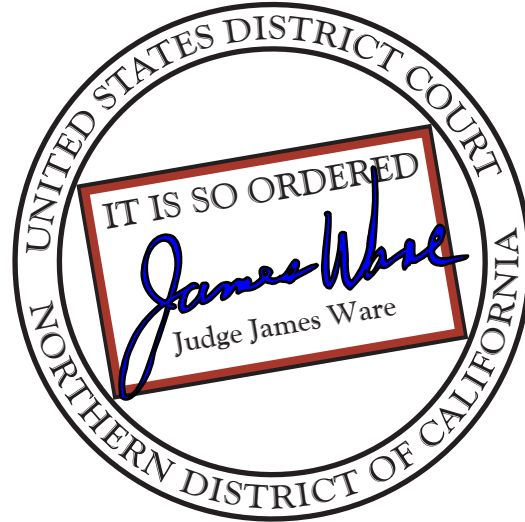


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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

**SARAH PEREZ, MICHELLE LACKNEY,
 RACHEL STEWART AND RACHEL
 HARDYCK, on behalf of themselves and
 others similarly situated,**
Plaintiffs,

v.

**STATE FARM MUTUAL AUTOMOBILE INS.
 CO., STATE FARM FIRE AND CASUALTY
 CO., STATE FARM GENERAL INSURANCE
 CO.**

**ALLSTATE INDEMNITY CO., ALLSTATE
 INSURANCE CO., ALLSTATE PROPERTY
 & CASUALTY INSURANCE CO.**

**GEICO GENERAL INSURANCE CO.,
 GEICO CASUALTY COMPANY, GEICO
 INDEMNITY CO.,**

CERTIFIED AUTOMOTIVE PARTS ASS'N.

LIBERTY MUTUAL INS. CO. and

UN-NAMED INSURANCE CONSPIRATORS

Defendants.

CASE NO. C 06-01962 (JW) (PSG)

**STIPULATION AND ORDER
 REGARDING REVISED CLASS
 SCHEDULING IN LIGHT OF
 COURT'S ORDER (DKT. #405)**

STIPULATION

Pursuant to the Court's July 6, 2011 Order Denying Plaintiffs' Motion To Exclude Expert Testimony and Denying Defendants' Motion For A Case Management Conference As Premature (Dkt. #405), Plaintiffs Sarah Perez, Michelle Lackney, Rachel Stewart and Rachel Hardyck (collectively "Plaintiffs") and Defendants State Farm Mutual Automobile Insurance Co., State Farm Fire and Casualty Co., State Farm General Insurance Co., Allstate Indemnity Co., Allstate Insurance Co., Allstate Property & Casualty Insurance Co., GEICO General Insurance Co.¹, Certified Automotive Parts Association, and Liberty Mutual Fire Insurance Co. (collectively "Defendants"), by and through their respective undersigned counsel, have met and conferred to work out a suitable class discovery and disclosure plan in light of the filing of the Fourth Amended Complaint and the Court's direction that "... the Court will allow Plaintiffs time to file Supplemental Responses to the expert reports at issue, to the extent that Plaintiffs believe that their own 'rebuttal rights' have been prejudiced by Defendants' expert reports."

1. Plaintiffs shall personally serve any additional supplemental class expert report no later than July 15, 2011, including a CD of documents reviewed with digitized images of all documents reviewed since prior CD disclosure.

2. Defendants shall personally serve supplemental or rebuttal class expert reports no later than August 5, 2011, including CDs of documents reviewed with digitized images of all documents reviewed since prior CD disclosure.

¹ GEICO counsel is not authorized to accept service for GEICO entities with which GEICO Plaintiff was not insured.

1 3. Plaintiffs shall personally serve rebuttal class expert reports no later than August 22,
2 2011, including CDs of documents reviewed with digitized images of all documents reviewed since
3 prior CD disclosure.
4

5 4. Any motions to exclude expert testimony shall be filed and served on or before
6 August 29, 2011.

7 5. All parties shall move, answer or otherwise plead in response to Plaintiffs' Fourth
8 Amended Complaint no later than August 12, 2011.²
9

10 6. Depositions of class experts shall take place according to the following schedule:

11 Plaintiffs' Class Expert Noll: Thursday, August 25, 2011 at 9:00 a.m.

12 Plaintiffs' Additional Rebuttal Experts: Tuesday-Wednesday, August 30-31, 2011.

13 Defendants' Class Expert Rubinfeld: Friday, September 9, 2011 at 9:00 a.m.

14 Defendants' Class Experts Vogler and Cripe: completed between September 12-16,
15 2011.
16

17 7. Under the Court's June 16, 2011 Order (Dkt. # 372), class discovery currently closes
18 on July 26, 2011. The class discovery deadline is now extended to September 16, 2011 to effectuate
19 the Court's Order of July 6, 2011 (Dkt. #405) and its suggested negotiations by the parties.
20

21 8. Accordingly, the deadlines for class briefing are reset as follows:

22 Class Motion filed and served on or before September 26, 2011.

23 Class Oppositions filed and served on or before October 24, 2011.

24 Class Reply filed and served on or before November 7, 2011.
25
26
27

28 ² *But see* footnote 1. This paragraph does not apply to GEICO General Insurance Co.

1 9. Class hearing is set on Thursday, November 17, 2011 or when the Court shall
2 otherwise specify.

3
4 10. The parties shall file a Joint Case Management Statement on or before November 8,
5 2011.

6 IT IS SO STIPULATED ON JULY 18, 2011.
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By //s//
On Behalf of All Plaintiffs

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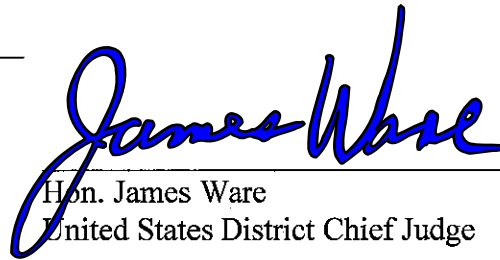
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ATTORNEYS FOR LIBERTY MUTUAL
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ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: July 27, 2011 _____


Hon. James Ware
United States District Chief Judge